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**Attorneys for Plaintiff MARK SNOOKAL**

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,

Plaintiff,

vs.

CHEVRON USA, INC., a California  
Corporation, and DOES 1 through 10,  
inclusive,

Defendants.

) CASE NO.: 2:23-cv-6302-HDV-AJR

)

)

) **DECLARATION OF OLIVIA FLECHSIG**

) **IN SUPPORT OF PLAINTIFF MARK**

) **SNOOKAL'S OPPOSITION TO**

) **DEFENDANT CHEVRON USA, INC.'S**

) **MOTION IN LIMINE NO. 2 TO**

) **EXCLUDE ANY EXPERT TESTIMONY**

) **FROM DR. ALEXANDER**

) **MARMUREANU**

)

) *[Filed concurrently with Plaintiff's*

) *Memorandum of Points and Authorities in*

) *Opposition to Defendant's Motion in Limine*

) *No. 2 and [Proposed] Order Denying*

) *Defendant's Motion in Limine No. 2]*

)

) District Judge: Hon. Hernan D. Vera

) Magistrate Judge: Hon. A. Joel Richlin

) Action Filed: August 3, 2023

) Trial Date: August 19, 2025

)

) Hearing Date: July 24, 2025

) Hearing Time: 10:00 a.m.

) Courtroom: 5B

**DECLARATION OF OLIVIA FLECHSIG**

I, Olivia Flechsig, declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am an associate with the law firm Allred, Maroko & Goldberg, counsel of record for Plaintiff Mark Snookal. As such, I have personal knowledge of the facts set forth below and, if called as a witness, could and would testify competently to such facts under oath.

2. I make this declaration in support of Plaintiff Mark Snookal's Opposition to Defendant Chevron USA, Inc.'s Motion in Limine No. 2 to Exclude Any Expert Testimony from Dr. Alexander Marmureanu.

3. Attached hereto as **Exhibit A** is a true and correct copy of the Physical Requirements and Working Conditions Form for the Reliability Engineering Manager Position in Escravos, Nigeria, which Mr. Snookal authenticated as Exhibit 7 to his declaration in support of his Opposition to Defendant Chevron USA Inc.'s Motion for Summary Judgment.

4. I defended the deposition of Plaintiff's Expert, Dr. Alexander R. Marmureanu on January 29, 2025, and I am in possession of a certified copy of his deposition transcript. Attached hereto as **Exhibit B** is a true and correct copy of relevant excerpts from Dr. Marmureanu's deposition transcript.

5. Attached hereto as **Exhibit C** is a true and correct copy of Dr. Marmureanu's Expert Report which he authenticated during his deposition as Exhibit 2.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this Declaration was executed on July 15, 2025, at Los Angeles, California.

  
Olivia Flechsig